

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

FELIPE RODRIGUEZ

-against-

THE CITY OF NEW YORK, ET AL.,

**NOTICE OF MOTION**

**1:21-cv-01649 (AMD) (RLM)**

**PLEASE TAKE NOTICE**, that upon Plaintiff Felipe Rodriguez's Memorandum of Law, dated March 28, 2022, and upon all prior pleadings and proceedings had herein, Plaintiff will move this Court, before the Honorable Ann M. Donnelly, United States District Judge, at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, at a date and time to be determined, for partial relief from the Court's March 14, 2022 Decision and Order denying in part and granting in part the Defendants' Motion to Dismiss Plaintiff's First Amended Complaint, and to reinstate Count IX and Count XI of the Amended Complaint, pursuant to Federal Rule of Procedure 60(b) and Local Rule 6.3, and for such other and further relief as the Court deems just and proper.

Dated: New York, New York  
March 28, 2022

Respectfully submitted,

ZMO Law PLLC

By: /s/  
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CC: All parties (via ECF)